

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
(Alexandria Division)

In re: :  
: PRESIDENTIAL GOLF PARTNERS, LLC. :  
: Case No. 08-15654-RGM  
: (Chapter 7)  
Debtor. :

**OBJECTION TO TRUSTEE'S NOTICE OF ABANDONMENT**

Comes Now, Hoppmann Audio Visual ("Hoppmann"), by counsel, and as its Objection to Trustee's Notice of Abandonment of the estate's interest in and to all property subject to the Uniform Commercial Code security interest of Virginia Commerce Bank, and respectfully states as follows:

1. This case was commenced by Voluntary Chapter 7 Petition filed September 16, 2008.
2. Hoppmann is a creditor and party in interest in this proceeding.
3. Hoppmann provided pre-petition labor, materials, and equipment to improve the leased premises that are subject of the Uniform Commercial Code security interest described in Trustee's notice of Abandonment, and that the materials and equipment might be classified as personal property in which Virginia Commerce Bank claims a security interest.
4. Hoppmann does not object to abandonment of the property encumbered by the Uniform Commercial Code security interest held by Virginia Commerce Bank; however, Hoppmann have certain rights and/or claims pursuant to Virginia mechanics' lien statutes and otherwise, and want the record to be clear that the proposed abandonment is without prejudice to Hoppmann's state law claims under the Virginia mechanics' lien statute or otherwise.

WHEREFORE, Hoppmann prays for an order approving the abandonment, but with an order expressly articulating that such abandonment is without prejudice to the rights of creditors under state law pursuant to Virginia mechanics' lien statute or otherwise.

HOPPMANN AUDIO VISUAL  
By Counsel

/s/ Lella Amiss E. Pape  
Lella Amiss E. Pape  
Virginia State Bar No. 28672  
Erik W. Fox  
Virginia State Bar No. 65456  
REES BROOME, PC  
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Gainesville, VA 20155  
(703) 790-1911  
Fax No. (571) 261-5873  
Counsel for Hoppmann Audio Visual

#### CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 11<sup>th</sup> day of November, 2008 a true and accurate copy of the foregoing Objection to Trustee's Notice of Abandonment was served by first-class mail, postage prepaid, upon the parties on the attached service list, and pursuant to Local Rule 5005-1(C)(8), the attached is filed with the Court service shall be by electronic delivery through the Court's ECF system, to :

Stephen E. Leach, Leach Travell Brutt, PC  
8270 Greensboro Drive, Suite 1050  
McLean, VA 22102

Robert Ogden Tyler, Trustee  
Tyler, Bartl, Ramsdell & Counts, P.L.C.  
700 South Washington Street, Suite 216  
Alexandria, VA 22314

Brian R. Kenney at [bkenney@millsstockbridge.com](mailto:bkenney@millsstockbridge.com)  
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John M. Tran at [jtran@dimuro.com](mailto:jtran@dimuro.com)

this the 11th day of November, 2008.

/s/ Lella Amiss E. Pape  
Lella Amiss E. Pape  
Counsel for Hoppmann Audio Visual